

## REMARKS

By this amendment, claim 13 was amended. Claims 1-12, 14 and 18 were previously canceled.

Claims 13, 15-17 and 19-23 remain pending in the application. Reconsideration and allowance of all of the claims is respectfully requested in view of the foregoing amendments and the following remarks.

### In regard to Rejection of Claims 13, 15-17 and 19, 22, 23 under 35 U.S.C. § 103(a)

The Examiner has rejected claims 13, 15-17 and 19, 22, 23 under 35 U.S.C. § 103(a) as being unpatentable over Obata et al (JP 2000-003705), Emori et al (JP 55-112114), and Ginzburg et al. '500, and further in view of Diolot '124. The Applicants believe that the Examiner's rejections of claims 13, 15-17 and 19, 22, 23 have been addressed and overcome by the present amendment.

By the present amendment, claim 13 has been amended and now recites the limitation that :

[...] a first encoder roller adapted to measure a speed of the lithium or lithium alloy sheet at an entrance of the lamination apparatus;

a first tension roller having a load cell adapted to measure the tension on the lithium or lithium alloy sheet at the entrance of the lamination apparatus; [...]

[...]a second encoder roller adapted to measure the speed of the lithium or lithium alloy film of reduced thickness at an exit of the lamination apparatus; wherein the thickness of the lithium or lithium alloy film of reduced thickness is determined by a speed differential between the first and second encoder roller; [...]

a second tension roller having a load cell adapted to measure the tension on the lithium or lithium alloy film of reduced thickness at the exit of the lamination apparatus;

and;

a winding roll for winding the lithium or lithium alloy film of reduced thickness, said winding roll connected to a driving means, the driving means responsive to signals from the load cell of the second tension roller for winding the lithium or lithium alloy film of reduced thickness [said film] under a controlled tension.

Support for this amendment is found in paragraphs [0035], [0039], and [0041] of the specification.

At least the above features of claim 13 as amended are not taught by Obata, Emori, Ginzburg or Diolot, alone or in combination, which combination is not admitted.

None of the reference cited by the Examiner discloses or teaches a first encoder roller at the entrance of the lamination apparatus which measures the speed of the lithium sheet prior to entering the lamination apparatus and a second encoder roller which measures the speed of the lithium or lithium alloy film of reduced thickness at the exit of the lamination apparatus such that the thickness of the lithium or lithium alloy film of reduced thickness is determined by the speed differential between the first and second encoder roller.

Furthermore, none of the reference cited disclose or teach a first tension roller having a load cell adapted to measure the tension on the lithium or lithium alloy sheet at the entrance of the lamination apparatus; a second tension roller having a load cell adapted to measure the tension on the lithium or lithium alloy film of reduced thickness at the exit of the lamination apparatus; and a winding roll connected to a driving means, wherein the driving means is responsive to signals from the load cell of the second tension roller for winding the lithium or lithium alloy film of reduced thickness under a controlled tension.

Obata simply discloses a feed roll 8 and a winding roll 9 but does not disclose a second tension roll link to the winding roll for controlling the tension of the lithium film as it exits the lamination apparatus.

Therefore, at least one feature of claim 13 as amended is not taught by Obata, Emori, Ginzburg or Diolot, alone or in combination.

As such, the Examiner is requested to withdraw his rejection of claim 13 and claims 15-17 and 19, 22, 23 depending therefrom.

In regard to Rejections of Claim 14 under 35 U.S.C. § 103(a)

The Examiner has rejected claim 14 under 35 U.S.C. § 103(a) as being unpatentable over Obata, Emori, Ginzburg, and Diolot, relying on Diolot.

Claim 14 was previously cancelled. The rejection is therefore moot.

In regard to Rejections of Claim 20 under 35 U.S.C. § 103(a)

The Examiner has rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Obata in view of Emori, Ginzburg, and Diolot, and further in view of Martt, U.S. Patent No. 4,179,913. The Applicants believe that the Examiner's rejection has been addressed and overcome by the present amendment.

As previously discussed, at least some features of amended claim 13 are not taught by Obata, Emori, Ginzburg, or Diolot, alone or in combination, which combination is not admitted.

These deficiencies in Obata, Emori, Ginzburg, or Diolot are not remedied by Martt, without admitting that Martt can be combined with Obata or Emori and reserving the right to argue thereagainst in the future.

Martt relates to a "metal strip tensioning apparatus for use in continuous strip reduction cold mill and method" and discloses two mechanical tensioning unit 28 and 35, each including three staggered rolls adapted to maintain tension in the metal strips while the end of a first metal strip is welded to the end of a second metal strip without stopping or slowing down the cold reduction milling process.

Specifically, Martt makes no mention of a second tension roller having a load cell adapted to measure the tension on the lithium or lithium alloy film at the exit of the lamination apparatus linked to the driving means of the winding roller for controlling the tension on the lithium film.

Therefore, at least one feature of claim 13 is not taught by Obata, Emori, Ginzburg, Diolot and Martt, alone or in combination. As such, the Examiner is requested to withdraw his rejection of claim 20 depending from claim 13.

In regard to Rejections of Claim 21 under 35 U.S.C. § 103(a)

The Examiner has rejected claim 21 under 35 U.S.C. § 103(a) as being unpatentable over Obata, Emori, Ginzburg, Diolot, and further in view of Rudolph, U.S. Patent No. 4,934,306. The Applicants believe that the Examiner's rejection has been addressed and overcome by the present amendment.

As previously discussed, at least some features of amended claim 13 are not taught by Obata, Emori, Ginzburg, or Diolot, alone or in combination, which combination is not admitted.

These deficiencies in Obata, Emori, Ginzburg, or Diolot are not remedied by Rudolph, without admitting that Rudolph can be combined with Obata or Emori and reserving the right to argue thereagainst in the future.

Rudolph mention a reel 174 coupled to a motor to control the speed of the immersion process and subsequent drying but is silent as to the control of the tension of the film exiting the immersion and drying process. Rudolph does not disclose a first and second encoder roll and a winding roller having a driving means responsive to signals from the load cell of the second tension roller for winding the film of reduced thickness under a controlled tension.

Therefore, at least one of the features of amended claim 13 is not taught by Obata, Emori, Ginzburg, Diolot and Rudolph, alone or in combination, which combination is not admitted. As such, the Examiner is requested to withdraw his rejection of claim 21 depending from claim 13.

In view of the above remarks, the Applicant respectfully submits that all of the currently pending claims are allowable and that the entire application is in condition for allowance.

Should the Examiner believe that anything further is desirable to place the application in a better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Alain Bernier, 59,289/

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Alain Bernier, Reg. No. 59,289  
Agent for the Applicant

Alain Bernier  
10335 Laverdure  
Montréal, Québec H3L 2L5  
Canada

Tel. (514) 382-9161  
Fax: (450) 655-4346